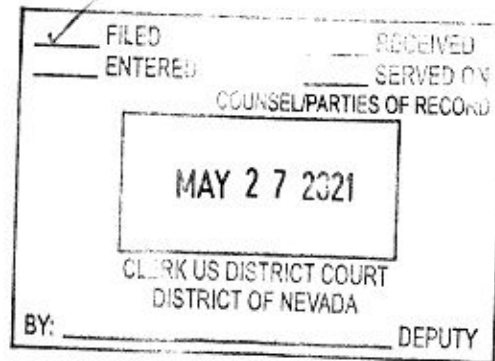


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Attorneys for United States



**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GAIL MANNEY,

Defendant.

Case No.: 3:21-cr-00019-HDM-WGC

CRIMINAL INDICTMENT

VIOLATION:

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –
 Illegal Acquisition of Firearms

THE GRAND JURY CHARGES THAT:

COUNT ONE

Illegal Acquisition of Firearms
(18 U.S.C. §§ 922(a)(6), 924(a)(2))

On or about April 21, 2021, in the State and Federal District of Nevada,

GAIL MANNEY,

defendant herein, in connection with the acquisition of firearms, that is: a Glock, Model 19, 9mm pistol bearing serial number BTCH296; a Glock, Model 19, 9mm pistol bearing serial number BTCG707; a Taurus, G2C, 9mm pistol bearing serial number ACC641938; a

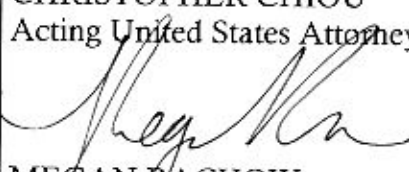
1 JA Industries LLC., J.A. Nine, 9mm pistol bearing serial number 455951; a Beretta, APX,
2 9mm pistol bearing serial number AXC047031; a Beretta, APX, 9mm pistol bearing Serial
3 No. A140035X; and a Smith & Wesson, SD40VE, .40 caliber pistol bearing Serial No.
4 FDC4939; from Hi-Cap Firearms, a licensed dealer of firearms within the meaning of
5 Chapter 44 of Title 18, United States Code, knowingly made and caused to be made a false
6 and fictitious written statement to Hi-Cap Firearms, which statement was intended and
7 likely to deceive Hi-Cap Firearms as to a fact material to the lawfulness of the sale of said
8 firearms under Chapter 44 of Title 18, United States Code, in that GAIL MANNEY did
9 complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473
10 Firearms Transaction Record, wherein GAIL MANNEY represented that she was the
11 actual transferee/buyer of the firearms, when in fact, and as the defendant well knew, she
12 was not the actual transferee/buyer of the firearms and was buying them for another
13 person, all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

14
15 DATED: this 27 day of May, 2021.

16 A TRUE BILL:

17 /s/
18 FOREPERSON OF THE GRAND JURY

19
20 CHRISTOPHER CHIOU
Acting United States Attorney

21 
22 MEGAN RACHOW
23 Assistant United States Attorney
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